

Sunkist



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Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Sunkist Growers
Post Office Box 7888
Van Nuys, CA 91409-7888
Tel: (818) 986-4800

RE: Docket No. 2001N-0548

Dear Food and Drug Administration:

On behalf of more than 6,000 Sunkist citrus growers, please accept these comments to the Proposed Rule titled "Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Reopening of the Comment Period," published in the April 4, 2005, Federal Register

Sunkist would like to reference the letter submitted by the Produce Marketing Association, requesting that FDA extend the comment period for 12 months to allow interested parties to conduct additional testing and submit the results to FDA for consideration. Sunkist strongly supports an extended comment period to plan, execute, and evaluate additional nutrient research so that the citrus data is as complete and extensive as possible. Citrus research requires sampling product at different times of the year to get values that are accurate reflections of the seasonal impact on nutrient content.

Accurate nutrition information is imperative to help consumers make healthy choices at the supermarket to promote wellness and reduce risk of obesity and other nutrition-related diseases. As promoted in the 2005 Dietary Guidelines for Americans and the 5 A Day for Better Health Program, Sunkist supports consumers eating a minimum of 5 servings daily of fruits and vegetables.

Sunkist is concerned that some of the FDA's proposed nutrient changes may communicate to consumers a message of diminished nutrient profile of some varieties of citrus. This message would be counter-productive to the goals of Healthy People 2010, of reducing the proportion of adults and children who are overweight or obese, and increasing the proportion of persons who consume at least two daily servings of fruit.

Sunkist appreciates the opportunity to present these comments. Please do not hesitate to contact us if we can be of further assistance.

Sincerely,

Robert Verloop
Vice President of Marketing
Sunkist Growers

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